



## U.S. Department of Justice

United States Attorney  
Southern District of New York

# MEMO ENDORSED

86 Chambers Street  
New York, New York 10007

September 25, 2023

**BY ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 9/26/2023

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*,  
No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents defendant the United States Department of State ("State Department") in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). I respectfully request a *nunc pro tunc* one-business day extension of the deadline to answer the complaint, from September 22 to today.

On August 18, 2023, the Court adopted the parties' proposed schedule for answering the complaint and summary judgment briefing, which included September 22 as the deadline for defendant to answer the complaint. ECF No. 18. Defendant's answer was not filed on Friday because the deadline had not been calendared properly. I apologize for any inconvenience to the Court or plaintiff. Plaintiffs consent to the requested extension. Thank you for Your Honor's consideration.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York  
*Attorney for Defendant*

By: /s/ Joseph A. Pantoja  
JOSEPH A. PANTOJA  
Assistant United States Attorney  
86 Chambers Street, 3<sup>rd</sup> Floor  
New York, New York 10007  
Tel.: (212) 637-2786  
E-mail: [joseph.pantoja@usdoj.gov](mailto:joseph.pantoja@usdoj.gov)

Application GRANTED.

SO ORDERED. Date: 9/26/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

cc: *Plaintiffs' counsel* (by ECF)